



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KRYSTAL SANCHEZ,
ADOLPHO GRIEGO, a.k.a. "Adolpho
Griego-Martinez,"
PAUL RAYMOND GUTIERREZ, and
MITZI BROOKS,

Defendants.

CRIMINAL NO. 20 CR 1901 JAP

Count 1: 21 U.S.C. § 846: Conspiracy;

Counts 2-4: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(B): Distribution of 50 Grams and
More of a Mixture and Substance
Containing Methamphetamine; 18 U.S.C.
§ 2: Aiding and Abetting;

Count 5: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(A): Possession with Intent to
Distribute of 500 Grams and More of a
Mixture and Substance Containing
Methamphetamine; 18 U.S.C. § 2: Aiding
and Abetting;

Count 6: 18 U.S.C. § 924(c)(1)(A)(i):
Using and Carrying a Firearm During and
in Relation to a Drug Trafficking Crime,
and Possessing a Firearm in Furtherance
of Such Crime;

Counts 7-9: 18 U.S.C §§ 922(g)(1) and
924: Felon in Possession of a Firearm and
Ammunition.

INDICTMENT

The Grand Jury charges:

Count 1

Beginning on or about September 7, 2020, and continuing to on or about September 29, 2020, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **KRYSTAL SANCHEZ, ADOLPHO GRIEGO, PAUL RAYMOND GUTIERREZ, and MITZI BROOKS**, unlawfully, knowingly and intentionally combined, conspired, confederated,

agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense defined in 21 U.S.C. § 841(a)(1), specifically, distribution of a controlled substance.

Quantity of Methamphetamine Involved in the Conspiracy

With respect to **MITZI BROOKS**, the amount of methamphetamine involved in the conspiracy attributable to each of them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine, contrary to 21 U.S.C. § 841(b)(1)(B).

With respect to **KRYSTAL SANCHEZ, ADOLPHO GRIEGO, and PAUL RAYMOND GUTIERREZ**, the amount of methamphetamine involved in the conspiracy attributable to each of them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, contrary to 21 U.S.C. § 841(b)(1)(A).

In violation of 21 U.S.C. § 846.

Count 2

On or about September 8, 2020, in Bernalillo County, in the District of New Mexico, the defendants, **PAUL RAYMOND GUTIERREZ** and **MITZI BROOKS**, unlawfully, knowingly, and intentionally distributed a controlled substance, and the offense involved 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 3

On or about September 15, 2020, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL RAYMOND GUTIERREZ**, unlawfully, knowingly, and intentionally

distributed a controlled substance, and the offense involved 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 4

On or about September 23, 2020, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL RAYMOND GUTIERREZ**, unlawfully, knowingly, and intentionally distributed a controlled substance, and the offense involved 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 5

On or about September 29, 2020, in Bernalillo County, in the District of New Mexico, the defendants, **KRYSTAL SANCHEZ** and **ADOLPHO GRIEGO**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, and the offense involved 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 6

On or about September 29, 2020, in Bernalillo County, in the District of New Mexico, the defendants, **KRYSTAL SANCHEZ** and **ADOLPHO GRIEGO**, during and in relation to a drug trafficking crime for which the defendants may be prosecuted in a court of the United States, specifically, possession with intent to distribute methamphetamine as charged in Count 5

of this indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed said firearm.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

Count 7

On or about September 29, 2020, in Bernalillo County, in the District of New Mexico, the defendant, **KRYSTAL SANCHEZ**, knowing that she had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, specifically:

- (1) forgery (issuing/transferring) (two counts),
- (2) possession of a controlled substance (three counts),
- (3) attempt to commit a felony, to wit, trafficking (by distribution) (narcotic or meth) (two counts), and
- (4) tampering with evidence,

knowingly possessed a firearm and ammunition in and affecting commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924.

Count 8

On or about September 29, 2020, in Bernalillo County, in the District of New Mexico, the defendant, **ADOLPHO GRIEGO**, knowing that he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, specifically:

- (1) shoplifting (\$500 - \$2,500),
- (2) escape from a peace officer,
- (3) forgery (issuing or transferring),
- (4) possession of a controlled substance (three counts), and
- (5) receiving or transferring a stolen motor vehicle,

In violation of 18 U.S.C. §§ 922(g)(1) and 924.

Count 9

Beginning on or about September 8, 2020, and continuing to on or about September 29, 2020, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL RAYMOND GUTIERREZ**, knowing that he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, specifically:

- (1) conspiracy to commit burglary (deadly weapon),
- (2) receiving or transferring a stolen motor vehicle, and
- (3) possession of a controlled substance (three counts),

knowingly possessed a firearm and ammunition in and affecting commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924.

FORFEITURE ALLEGATIONS

Upon conviction of any offense in violation of 21 U.S.C. §§ 841 or 846, the defendants, **KRYSTAL SANCHEZ, ADOLPHO GRIEGO, PAUL GUTIERREZ, and MITZI BROOKS**, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense for which the defendant is convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense(s) of conviction.

The property to be forfeited to the United States includes, but is not limited to, the following:

PERSONAL PROPERTY

- a. a sum of money equal to at least \$ 4,126 in U.S. currency;
- b. an SCCY, model CPX-2, 9mm pistol, bearing serial number 811807;

- c. a Springfield, model XD40, .40 caliber pistol, with laser sight, bearing serial number GM113612;
- d. a Taurus, model PT111 Millennium, 9mm pistol, bearing serial number TIT94802;
- e. various rounds of ammunition and a magazine seized from the premises of 616 Prospect Ave. NW.

Upon conviction of any offense in violation of 18 U.S.C. §§ 922(g) or 924(c), the defendants, **KRYSTAL SANCHEZ, ADOLPHO GRIEGO, and PAUL RAYMOND GUTIERREZ**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

- a. an SCCY, model CPX-2, 9mm pistol, bearing serial number 811807;
- b. a Springfield, model XD40, .40 caliber pistol, with laser sight, bearing serial number GM113612;
- c. a Taurus, model PT111 Millennium, 9mm pistol, bearing serial number TIT94802;
- d. various rounds of ammunition and a magazine seized from the premises of 616 Prospect Ave. NW.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY


Assistant United States Attorney